

CHRISTOPHER MEYER

15

1 you know, inspection, we find, you know, everything
2 functions as designed.

3 BY MR. BAGNELL:

4 Q. I'm not asking that, Mr. Davis (sic). I'm not asking
5 what you guys find.

6 Exhibit A to Exhibit 1, I just want to read this to
7 you. You were designated by Sig Sauer on the topic of
8 number one on Exhibit A. I want to -- well, Exhibit 2 is
9 in. I just want to show you that, Mr. Davis (sic),
10 Exhibit A to that.

11 I'm sorry, just so there's no confusion. I'll just
12 point -- right. On the first page, number one. I want
13 to read this into the record.

14 "The number, type, date, and location of all
15 reported accidental discharges involving the Sig Sauer
16 P320 pistol and any of its variants from January 1st,
17 2014, to the present."

18 Do you see that?

19 A. Mm-hm.

20 Q. And do you see that your name is beneath that?

21 A. I do.

22 Q. All right. Can you answer that question on behalf of Sig
23 Sauer?

CHRISTOPHER MEYER

16

1 A. That is not a question I can answer, no.

2 MR. BAGNELL: All right. And, for the record,
3 I want to note that the objection filed to our 30(b)(6)
4 notice, I received it, I believe, Monday night when I was
5 already in New Hampshire. As counsel for Sig is aware,
6 there's a bunch of objections here. We intend to
7 challenge this. We believe these objections were
8 invalidly asserted, certainly untimely asserted. But we
9 can proceed. I just wanted to put that on the record in
10 case we have to continue this at a later point. We
11 reserve the right to move to compel further testimony.

12 BY MR. BAGNELL:

13 Q. In any way, regarding number one, Mr. Meyers -- is it
14 Meyer? Meyer. I'm sorry.

15 A. Yes.

16 Q. Are you withholding any information, or your testimony is
17 that you cannot answer that question?

18 A. I'm not withholding any information. I just can't answer
19 that question.

20 Q. You can't answer that question.

21 A. Yeah.

22 Q. Do you know who could answer that question at Sig
23 Sauer?